



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**MAR 19 2018**

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Bob Walls, General Manager  
Advanced Disposal Services  
10690 West Six Mile Rd.  
Northville, Michigan 48168

Re: Notice of Intent to File Civil Administrative Complaint Against  
Advanced Disposal Services, Inc.

Dear Mr. Walls:

The U.S. Environmental Protection Agency, Region 5 (EPA), plans to file an administrative complaint for civil penalties against Advanced Disposal Services, Inc. (Advanced Disposal or you) for violations of the Clean Air Act (CAA), 42 U.S.C. §§ 7401–7671q, and its implementing regulations. As indicated in the FOV that we issued to you dated September 29, 2016, EPA has determined that you violated the landfill cover integrity standards in the New Source Performance Standards for Municipal Solid Waste Landfills (Landfills NSPS) and did not exhibit good air pollution control practices in the National Emission Standards for Hazardous Air Pollutants (NESHAP) and NSPS general provisions at the Arbor Hills Landfill located at 10690 West Six Mile Road, Northville, Michigan. Based on information currently available to us, we plan to propose a civil penalty of \$330,000 for the alleged violations.

The Landfills NSPS standards are meant to maximize and maintain the collection and control of landfill gas from municipal solid waste landfills. Failure to comply with these standards allows for the potential release of excess landfill gas into the atmosphere containing volatile organic compounds (VOCs), hazardous air pollutants (HAPs), and greenhouse gases. VOCs and HAPs can lead to adverse health effects including respiratory damage. Greenhouse gas emissions contribute to global climate change.

This letter is not a demand to pay a penalty. We will not ask you to pay a penalty until we file the complaint or a final order. Before filing the complaint, we are giving you the opportunity to present any information that you believe we should consider. Relevant information might include evidence that you did not violate the law, evidence that you relied on compliance assistance from EPA or a state agency, evidence that we identified the wrong party or financial data bearing on your ability to pay a penalty.

You may assert a claim of business confidentiality under 40 C.F.R. part 2, subpart B, for any portion of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. part 2, subpart B. If you fail to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it.

We may use any information you submit in support of an administrative, civil, or criminal action.

Within 30 calendar days after you receive this letter, please send your response to:

Kenneth Ruffatto  
Air and Radiation Division (AE-18J)  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

If you have any questions, or wish to set up a discussion, please telephone Kenneth Ruffatto at (312) 886-7886 or e-mail him at [ruffatto.kenneth@epa.gov](mailto:ruffatto.kenneth@epa.gov).

Thank you for your prompt attention to this matter.

Sincerely,



Sara Breneman  
Chief  
Air Enforcement and Compliance Assurance Branch

cc: Phil Comella, Freeborn & Peters LLP

**CERTIFICATE OF MAILING**

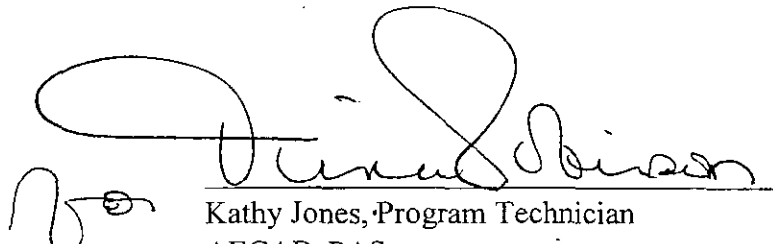
I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Bob Walls, General Manager  
Advanced Disposal Services, Inc.  
10690 West Six Mile Road  
Northville, Michigan 48168

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by E-mail to:

Phil Comella, Freeborn & Peters, LLP  
[pcomella@freeborn.com](mailto:pcomella@freeborn.com)

On the 20<sup>th</sup> day of March 2018.

  
Kathy Jones, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70150640 0004 5965 5908